

REMARKS

This application is a continuation of an earlier filed application, U.S. Patent Application No. 09/740,670, filed December 18, 2000 (the “parent application”).

I. Claims 1 and 20

Independent claims 1 and 20 in the present application are identical to originally filed independent claims 1 and 24 in the parent application. In the parent application, in an Office Action dated January 14, 2003, the Examiner rejected originally filed claims 1 and 24 as being anticipated by U.S. Patent 6,026,452 (Pitts). Applicants request reconsideration of claims 1 and 20 in the present application in view of the following remarks.

In rejecting originally filed claims 1 and 24 in the parent application, the Examiner asserted that Pitts discloses creating a free list having entries with addresses of free memory locations. For support the Examiner cites to Pitts, column 18, lines 39 et seq. The cited portion of Pitts discloses a “channel free list” that is formed by linking “free channels” together. Pitts discloses that a “channel” is a data structure. (See column 15, line 53 and Figs. 4A and 4B). Thus, in Pitts, the entries of the “channel free list” are data structures and not “addresses of free memory locations” as recited in claims 1 and 20 in the present application.

The Examiner also asserted that Pitts discloses caching a portion of the free list in a cache having entries with addresses of free memory locations. For support the Examiner cites to Pitts column 46, lines 46 bridging column 47, line 65. The cited portion includes dependent claims 5, 6, 10, and 11, which recite selecting the least recently used of the previously claimed channels for further processing. Presumably, these claims correspond to the operation described in column 18, lines 47-49 of removing a channel from the channel free list when the channel is used. Thus, in Pitts, when a channel is used, the channel is removed from the channel free list, but no portion of the channel free list is cached in a cache “having entries with addresses of free memory locations” as recited in claims 1 and 20 in the present application.

The Examiner also asserted that a cache including a first and second threshold is taught by Pitts as a plurality of buffers assigned to the channel limited to a maximum/minimum number. For support, the Examiner cites to column 47, lines 25 et seq. The cited portion includes dependent claims that recite a maximum number of channels. However, the cited portion does not disclose a minimum number of channels. Thus, Applicants assert that Pitts does not disclose “a first threshold and a second threshold.”

For at least these reasons, Applicants assert that Pitts does not disclose each and every feature of independent claims 1 and 20 in the present application.

II. **Claims 12 and 18**

Independent claims 12 and 18 in the present application are identical to originally filed independent claims 12 and 22 in the parent application. In the parent application, the Examiner rejected originally filed claims 12 and 22 as being obvious by Pitts in view of US Patent No. 5,875,461 (Lindholm). Applicants request reconsideration of claims 12 and 18 in the present application in view of the following remarks.

In rejecting claims 12 and 22 in the parent application, the Examiner asserted that “Lindholm discloses global cache memory being used along with the free list contains multiple entries for synchronizing data entries from other caches in the system, wherein entries are distributed between the memory banks and the memory channels.” For support the Examiner cites to column 1, line 66 bridging column 2, line 25. The cited portion discloses that “synchronization constructs are stored in a data structure in a global cache,” and a “free list contains entries identifying the synchronization constructions that are not allocated to any object.” Lindholm discloses that the free list 130 is a subset of synchronization constructs (e.g., constructs 124-N to 124-M in Fig. 2) of a cache of synchronization constructs 124. (See column 6, lines 25-27 and Fig. 2.) Because the free list 130 in Linholm already exists as a subset of a cache of synchronization constructs, an entry from the free list 130 can not be written to the cache of synchronization constructs. Thus, Applicants assert that Lindholm does not disclose “writing entries from said free

lists to a global cache” as recited in claim 12, or “writing entries from said free lists to a plurality of caches” as recited in claim 18.

Additionally, the cited portion of Lindholm makes no mention of an association between a free list and a memory bank in a memory channel. As such, Applicants assert that Lindholm does not disclose “a free list is created for each memory bank in each memory channel” as recited in claim 12, or “free lists are associated with a plurality of memory banks in a plurality of memory channels” as recited in claim 18.

For at least these reasons, Applicants assert that the combination of Pitts and Lindholm does not make obvious independent claims 12 and 18 in the present application.

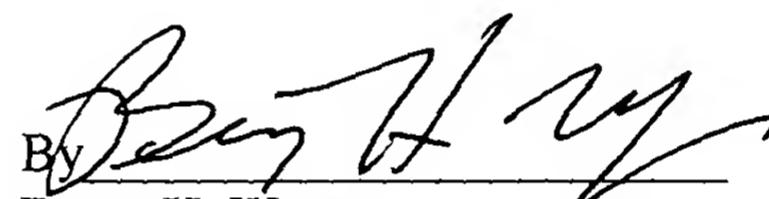
III. Conclusion

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. If the Examiner believes that a telephone interview would be beneficial, the Examiner is invited to call Peter Yim at 415/268-6373 or the undersigned.

In the unlikely event that the transmittal letter is separated from this document and/or the Patent Office determines that an extension and/or other relief is required, Applicants petition for any required relief including extensions of time and authorizes the Assistant Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. 388682000501.

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Respectfully submitted,


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